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OAKLAND, CALIFORNIA

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Attorney for Defendant
John Morgan

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

TIFFANY TAYLOR, CHRISTOPHER
JOHNSON, JOHN MORGAN, KIM
DRAGO, and MICHAEL DOWNEY

Defendants.

Case No. CR-05-00651 CW

**STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME FROM
JANUARY 9, 2006 TO JANUARY 30,
2006 FROM THE SPEEDY TRIAL ACT
CALCULATION (18 U.S.C. §
3161(h)(8)(A))**

CONFIDENTIAL CJA FILE

The United States of America, by and through its attorneys, Kevin Ryan, United States Attorney for the Northern District of California, by Kirstin Ault, Assistant U.S. Attorney, and defendants TIFFANY TAYLOR, CHRISTOPHER JOHNSON, JOHN MORGAN, KIM DRAGO, and MICHAEL DOWNEY, and by their undersigned attorneys, hereby stipulate and agree that the date on which the defendants' pretrial motions shall be served and filed shall be continued from January 9, 2006 to January 30, 2006. The government's opposition shall be served and filed on February 6, 2006, and any replies shall be served and filed on February 15,

2006 A hearing on the motions shall be heard on or after February 20, 2006 or as directed by the Court.

The parties hereby stipulate and agree that the time between January 9, 2006 and January 30, 2006 shall be excluded from the calculation of time in which the trial of the captioned matter must commence pursuant to the Speedy Trial Act.

The grounds for this exclusion are that counsel for defendants require additional time to consult with their clients in connection with the effective preparation of motions and other matters related to the defense of the case and to allow for the continuity of counsel in this case, which make it unreasonable to expect adequate preparation for pretrial proceedings or retrial within the time limits established by the Speedy Trial Act. The parties agree that the ends of justice served by the exclusion of this time outweigh the best interests of the public and the defendants in a speedy trial, all pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

Respectfully submitted this 6th day of January 2006.

STIPULATED:

DATED: _____

DATED: 1/5/06

DATED: _____

DATED: _____

DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

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DATED: _____

JEROME MATTHEWS
Attorney for Defendant Michael Downey

IT IS SO ORDERED:

DATED: _____

CLAUDIA WILKIN
United States District Judge

BOIES SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

VAR. 1 2000 0 2010

NO 1140 1 J

2006. A hearing on the motions shall be heard on or after February 20, 2006 or as directed by the Court.

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Respectfully submitted this ____th day of January 2006.

STIPULATED:

DATED: 1/5/06

DATED: 1/5/06

DATED: _____

DATED: _____

DATED: _____


KIRSTEN M. AULT
Assistant United States Attorney


DAVID W. SHAPIRO
Attorney for Defendant John Morgan


EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor


RANDALL KNOX
Attorney for Defendant Christopher Johnson


SHANA KEATING
Attorney for Defendant Kim Drago

Jan. 4. 2006 3:53PM

No. 1147 P 3/4

BOIES SCHILLER & FLEXNER LLP
OAKLAND, CALIFORNIA

2006. A hearing on the motions shall be heard on or after February 20, 2006 or as directed by the Court.

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Respectfully submitted this ____th day of January 2006.

STIPULATED:

DATED: _____

DATED: 1/3/06

DATED: 1/5/06

DATED: _____

DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

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STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME FROM JANUARY 9, 2006 TO JANUARY 30, 2006 FROM THE SPEEDY TRIAL ACT CALCULATION (18 U.S.C. § 3161(h)(8)(A))

2006. A hearing on the motions shall be heard on or after February 20, 2006 or as directed by the Court.

The parties hereby stipulate and agree that the time between January 9, 2006 and January 30, 2006 shall be excluded from the calculation of time in which the trial of the captioned matter must commence pursuant to the Speedy Trial Act.

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Respectfully submitted this ____th day of January 2006.

STIPULATED:

DATED: _____

DATED: 1/5/06

DATED: _____

DATED: 1/6/06

DATED: _____

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson

SHANA KEATING
Attorney for Defendant Kim Drago

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Respectfully submitted this ____th day of January 2006.

STIPULATED:

DATED: _____

DATED: 1/5/06

DATED: _____

DATED: _____

DATED: 1/4/06

KIRSTEN M. AULT
Assistant United States Attorney

DAVID W. SHAPIRO
Attorney for Defendant John Morgan

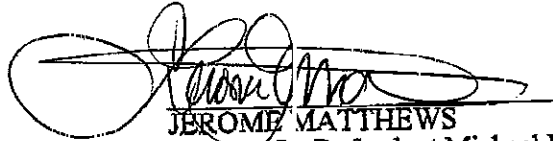
EUGENE ILLOVSKY
Attorney for Defendant Tiffany Taylor

RANDALL KNOX
Attorney for Defendant Christopher Johnson
SHANA KEATING
Attorney for Defendant Kim Drago

Jan 4 2006 3:59PM

No. 1147 P. 4/4

1 DATED: 1/4/06



JEROME MATTHEWS
Attorney for Defendant Michael Downey

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3 IT IS SO ORDERED: Hearing on motions will be held on 2/27/06 at 2:00 p.m.

4 DATED: 1/10/06

5 CLAUDIA WILKIN
United States District Judge

